

# Exhibit G

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHERYL BISHOP,

Plaintiff,

vs.

JEFF SESSIONS, ACTING ATTORNEY  
GENERAL, DEPARTMENT OF JUSTICE,  
ALCOHOL, TOBACCO, FIREARMS &  
EXPLOSIVES,

Case No. C18-00599-TSZ

Defendant.

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VIDEOTAPED DEPOSITION OF BRADFORD DEVLIN

July 8, 2019

9:51 a.m.

1000 SW Third Avenue, Suite 600

Portland, Oregon

REPORTED BY:

Melinda Hermansen

CSR No. 10-0420, RPR

1 APPEARANCES:

2  
3 For Plaintiff:

4 MACDONALD HOAGUE & BAYLESS  
5 MR. JESSE A. WING  
6 705 2nd Avenue, Suite 1500  
7 Seattle, WA 98104-1745  
(206) 622-1604  
Jessew@mhb.com

8 For Defendant:

9 UNITED STATES ATTORNEY'S OFFICE  
10 MS. PRISCILLA CHAN  
11 MS. LILY MONFORT (Via telephone)  
12 700 Stewart Street, Suite 5220  
Seattle, WA 98101-4438  
(206) 553-7970  
Priscilla.chan@usdoj.gov

13 Also Present:

14 MR. ZACH HOOVER, Videographer  
15  
16  
17  
18  
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1 affidavits that you signed regarding your own EEO  
2 complaint and Cheryl Bishop's EEO complaints, have you  
3 signed any other affidavits or declarations in EEO  
4 matters?

5 A. No.

6 Q. Do you feel like you understand my question?

7 A. Yes, I believe I do. I haven't -- I haven't  
8 signed any other declarations other than -- than the  
9 complaints, my only EEO complaint or the one involving  
10 Cheryl Bishop.

11 Q. Okay. Would you briefly provide a summary of  
12 your career at the ATF; you know, when you started, what  
13 roles you played, what the locations were.

14 A. Yes.

15 Q. Thank you.

16 A. I was hired as an ATF agent in June of 1999.  
17 My first -- my first place -- my first work station was  
18 El Paso, Texas. I spent four years -- three or four  
19 years there. I went from El Paso to Tacoma, Washington  
20 as an agent. I worked Seattle and Tacoma, Washington  
21 area. I was an agent for about nine years.

22 I was promoted to the resident -- or, I'm

23 sorry, the group supervisor job in -- I believe it was

24 2007, late 2007. That was the gang group in Seattle,

25 Washington. Then I spent three, four years in a Seattle

1 gang group. Then I accepted a position as the Resident  
2 Agent in Charge of the Portland, Oregon field office.  
3 And I -- I was in Portland as the Resident Agent in  
4 Charge until 2015. And then I opened the office in  
5 Eugene, Oregon as the Resident Agent in Charge. And  
6 I've been in Eugene since. I currently hold that  
7 position and reside in Eugene.

8 Q. Approximately when -- thank you. When in 2015  
9 did you open the Eugene office?

10 A. Summertime. I would say probably -- probably  
11 July or August.

12 Q. Okay. Was that -- did you volunteer to open  
13 the Eugene office?

14 A. I had a couple of options. I was being heavily  
15 recruited to go to Washington, D.C. I wasn't interested  
16 in going to Washington, D.C. At the same time, for  
17 several years while I was in Portland, I had requested  
18 an office be -- be initiated in Eugene, Oregon to cover  
19 Central and Southern Oregon, and it took several years  
20 for ATF to -- to give that -- to give the blessing for  
21 that. So they -- so I was -- I was offered the option  
22 of going to Eugene and opening a new office, and I  
23 accepted that over going to Washington, D.C.

24 Q. Okay. Were you being pushed to do one or the  
25 other?

1 A. I was being highly encouraged, I wouldn't say  
2 pushed, to go to Washington, D.C.

3 Q. For what reason?

4 A. Because I had been a low level supervisor for  
5 quite a -- quite a few years. And ATF's -- ATF's or  
6 management's belief was if you've been a supervisor for  
7 more than five years, you should -- you should promote  
8 up. And the next step would be to go to  
9 Washington, D.C.

10 Q. Okay. So it was the Seattle office management  
11 that was pushing you to go to D.C.?

12 A. Yes.

13 Q. Okay. Or opening Eugene?

14 A. That's correct.

15 Q. Okay. But you saw either one as an effort by  
16 your management to promote you; is that right?

17 A. The Eugene position was not a promotion.

18 Q. Okay.

19 A. It was just a lateral.

20 Q. Okay. Okay. So when did you do the academy?

21 A. The ATF Academy was June of 1999.

22 Q. And was Doug Dawson one of the instructors that  
23 you had in the academy?

24 A. He was a -- I wouldn't call it an instructor.  
25 He was a supervisor of the academy class, a visiting

1 and I was in that program for about three or four years.

2 Q. Was it at the end of that that you became the  
3 supervisor in Seattle?

4 A. I first became a supervisor in Seattle in 2007.

5 Q. So was that right after?

6 A. It was -- yes, yes.

7 Q. Okay. And you performed more than one  
8 undercover operation?

9 A. Yes.

10 Q. How many would you say you did?

11 A. Probably hundreds.

12 Q. Okay. And I understand one of them is called  
13 the Order of Blood; is that right?

14 A. Yes.

15 Q. Okay. Tell me a little bit about the Order of  
16 Blood.

17 A. Order of Blood is an Aryan-Nation-sponsored  
18 outlet motorcycle club. It was based in Ohio. And  
19 there were three full-time ATF undercover agents that  
20 were able to -- to get in. I was one of the three. I  
21 was able to get membership in it.

22 It was a -- it was a lengthy criminal case. I  
23 was undercover on that case for probably eight months.

24 It was -- it was very successful at the end. We had --  
25 we had a lot of arrests.

1 Q. Congratulations.

2 A. Thank you.

3 Q. I don't want to know a whole lot of the  
4 specific details, but some general details would be  
5 helpful.

6 Did you go out of state to do this undercover  
7 work?

8 A. Yes. It was in Ohio.

9 Q. You did go to Ohio?

10 A. Yes.

11 Q. Okay. And did you essentially live with these  
12 bikers?

13 A. Yes.

14 Q. So this was kind of a 24/7 lifestyle that you  
15 had to adopt?

16 A. Yes.

17 Q. Okay. And you mentioned that they were Aryan.  
18 Is that another phrase -- another word for a white  
19 supremacist?

20 A. The Aryan is a group.

21 Q. Okay.

22 A. They call themselves Aryans, but yes, they are  
23 white supremacists.

24 Q. And during the course of your undercover  
25 operations, did you have to participate in activities



1 tattoo, the club tattoo.

2 Q. Okay. And what is the tattoo?

3 A. It's a German eagle with SS bolts in the  
4 center.

5 Q. What is an SS bolt?

6 A. It's part of Hitler's secret police. It  
7 signifies support for Hitler.

8 Q. Okay. Was there Hitler talk among the group?

9 A. Yes.

10 Q. Okay. Support for Hitler, in other words?

11 A. Yes.

12 Q. Okay.

13 A. Yes.

14 Q. And you still have that tattoo; is that  
15 correct?

16 A. Yes.

17 Q. I'd like to see it, please.

18 A. Okay. I got to take off my --

19 Q. Yeah.

20 A. -- shirt.

21 MS. CHAN: And, Counsel, for the record, it's  
22 just subject to the objections that we sent you.

23 Go ahead.

24 BY MR. WING:

25 Q. Let me just ask you first. Do you have any

1 Q. Okay. You've described that you thought she  
2 had little street experience, and that some people  
3 thought she was bossy, and that she wasn't aggressive on  
4 getting criminal cases.

5 Does that all amount to a train wreck or is  
6 there more?

7 A. Well, in my mind, there's more.

8 Q. Please explain.

9 A. I think that reputation is very important in  
10 law enforcement. And I -- I knew that before she came  
11 to my group, her -- her reputation was poor. And then  
12 when she -- when she arrived in my group, she  
13 worked -- I was her supervisor for -- I'm guessing about  
14 a year, maybe a little bit more. She didn't have many,  
15 if any, cases on her own.

16 I remember one significant case, the only one  
17 that she worked was one that another agent worked prior  
18 to her, and I had transferred it to her. But I do  
19 remember Cheryl completing that case and -- and doing  
20 fairly well when she got that case.

21 The other point that stands out in my mind  
22 is -- is the other agents in the group had -- had a  
23 difficult time getting along with her, or maybe she had  
24 a difficult time getting along with them.

25 Q. In what way?

1 A. She was bossy. She would try to tell them how  
2 to do their job, many of which had many, many years of  
3 experience and were very, very competent.

4 Q. Did they complain to you?

5 A. A couple of them did, yes.

6 Q. Did you go to Cheryl and say, "Knock it off.  
7 Your colleagues think you're bossy"?

8 A. No, no.

9 Q. Did you give her any feedback?

10 A. I remember giving her feedback about a report  
11 she wrote one time. I tried to give her opportunities  
12 to work so that I could see what she could do. And I do  
13 remember giving her positive feedback one time about a  
14 report that she had written.

15 Q. Okay. Did you ever go to your ASACH and say,  
16 "Cheryl's a train wreck. What do I do with her?"

17 A. No.

18 Q. Why not?

19 A. I felt I could work with her.

20 Q. Did there come a time when you quite literally  
21 got in her face when she was in your office?

22 A. No, I didn't get in her face. She -- that was  
23 a time where there was -- I don't even remember what the  
24 dispute was. But I had sent an e-mail out about  
25 gossiping, about talking negatively about other people,

1 A. Yes.

2 Q. And what did they tell you?

3 A. They said they couldn't.

4 Q. Did that surprise you?

5 A. Yes.

6 Q. Why did it surprise you?

7 A. It didn't make any sense to me. I thought that  
8 they should have probably called me and at least learned  
9 of the situation about what happened before they  
10 forwarded it.

11 Q. Okay.

12 A. I thought there -- I thought there should have  
13 been a little bit of inquiry -- inquiry on their part  
14 first.

15 Q. Did you tell them what happened?

16 A. Yes.

17 Q. Did you tell them that you had -- in that  
18 conversation, did you tell them that you had called  
19 Cheryl Bishop a train wreck to U.S. Attorneys?

20 A. Yes.

21 Q. Did you -- what was their reaction to that?

22 A. I don't think they had much of a reaction.

23 Q. Did you get the impression they thought it was

24 no big deal?

25 A. No, I didn't get that impression at all.

1 Q. What kind of impression did you get?

2 A. I got the impression that it was a big deal

3 because they had -- they had talked with ATF counsel and

4 it ultimately got referred to Internal Affairs. So that

5 was my sign it was a big deal.

6 Q. Have you come to recognize that it was not  
7 something you should have done or do you sort of shrug  
8 it off like, Okay, it's just a difference of opinion?

9 MS. CHAN: Object to the form. Answer if you  
10 know.

11 THE WITNESS: I don't shrug it off.

12 What was your question?

13 BY MR. WING:

14 Q. Do you think it was fine?

15 A. Do I think it was fine as to what I --

16 MS. CHAN: Object -- go ahead. Object to the  
17 form.

18 BY MR. WING:

19 Q. Do you think it was fine for you to tell AUSAs  
20 that Cheryl Bishop was a train wreck?

21 MS. CHAN: Object to the form. Answer if you  
22 know.

23 THE WITNESS: Yes, I do.

24 BY MR. WING:

25 Q. Have you ever told anyone that you thought

1 MS. CHAN: Object to the form of the question.  
2 Answer if you know.

3 THE WITNESS: He had asked me -- Ben Scoll  
4 asked me during a RAC conversation in Seattle, he had  
5 asked me -- he said, "Hey, I heard about this. What  
6 happened?"

7 And I told him, "Well, it's a long story."

8 And he said, "Well, I got time." So I did give  
9 him a brief synopsis at to what had happened, maybe a  
10 two-minute synopsis, one-minute synopsis. So I did tell  
11 him, yes.

12 BY MR. WING:

13 Q. Including telling him that you had disparaged  
14 Cheryl Bishop to the AUSAs?

15 A. I had told him what I referred to, yes.

16 Q. Did you not recognize that in passing along  
17 your opinion as part of telling this story, you were  
18 continuing to disparage her?

19 MS. CHAN: Object to the form, argumentative.  
20 Answer if you know.

21 THE WITNESS: No.

22 BY MR. WING:

23 Q. You thought it was fine?

24 A. Sure.

25 Q. Have you told anybody else?

REPORTERS CERTIFICATE

I, Melinda Hermansen, CSR No. 10-0420,  
Certified Shorthand Reporter, do hereby certify:

That the foregoing proceedings were taken  
before me at the time and place therein set forth, at  
which time the witness was put forth under oath by me;

That the testimony of the witness, the  
questions propounded, and all objections and statements  
made at the time of the examination were recorded  
stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent  
was not requested;

I further certify that I am not a relative or  
employee of any attorney of the parties, nor financially  
interested in the action.

I declare under penalty of perjury under the  
laws of Oregon that the foregoing is true and correct.

Dated this day 20th day of July, 2019.



Melinda Hermansen  
CSR No. 10-0420, RPR

Bradford Devlin  
July 08, 2019

BRADFORD DEVLIN

I have read the transcript of my deposition taken on July 8, 2019, at Portland, Oregon, and make the following additions or corrections:

PAGE	LINE	CORRECTION AND REASON FOR CORRECTION
P 14,	L 6:	change "outlet" to outlaw
P 16,	L 18:	change "clothing" to club
P 19,	L 4:	change "shouldn't to should
P 30,	L 6:	change "ASACH" to ASAC
P 33,	L 6:	change "68 agents" to 6-8 agents
P 83,	L 7:	change "2140" to 21 Authority

BRADFORD DEVLIN

Subscribed and sworn to me before this 30th day of July, 2019.

\_\_\_\_\_  
Notary Public for the State  
of \_\_\_\_\_  
residing at \_\_\_\_\_  
My Commission Expires: \_\_\_\_\_

Re: Bishop vs. Sessions  
United States District Court, Western District  
of  
Washington, No. C18-00599-TSZ  
LH